



Renewable Fuels Association

223369

August 21, 2008- amended

Charles Nottingham
Chairman
Surface Transportation Board
Attn: STB Ex Parte No 677 (Sub-No. 1)
395 E Street, S.W.
Washington, DC 20423-0001

Dear Chairman Nottingham:

The Renewable Fuels Association (RFA) appreciates the opportunity to comment regarding the "Common Carrier Obligation of Railroads- Transportation of Hazardous Material" hearing. RFA is the national trade association representing the U.S. ethanol industry. Ethanol has become an essential component of the U.S. motor fuel market. Today, ethanol is blended in more than 60 percent of the nation's fuel, and is sold virtually from coast to coast and border to border. The 9 billion gallons of ethanol produced and sold in the U.S. last year contributed significantly to the nation's economic, environmental and energy security. At the July 2008 Surface Transportation Board hearing, the flammability range of ethanol was brought into the discussion. The purpose of the hearing was to discuss issues relating to the common carrier obligation of railroads with respect to the transportation of hazardous materials, as well as toxic by inhalation (TIH) hauled by the railroads. As the RFA did not participate in the hearing, I respectfully submit the following information in response to the questions raised about the ethanol's flammability and the safe transport of ethanol.

With regard to ethanol's wider flammability range, I concur with a verbal statement made at the July hearing that ethanol possesses a "wider" flammability range, lower explosion limit (LEL) 3.3% to the upper explosion limit (UEL) 19%, compared to gasoline, which is (LEL) 1.4% to (UEL) 7.6%. A wider flammability range indicates there is a greater chance for explosion upon ignition. I would contend that as the potential for explosion may be greater technically, reality does NOT reflect this risk. Hazardous material manufacturers and transporters utilize advanced safety procedures for flammable materials whether within or outside the flammability range.

Rail transportation has been and continues to be the safest and most efficient mode of transportation for fuel ethanol. In recent years, there has been an exponential growth in the transport of ethanol by rail as the industry's output has increased. From 2004 to 2007, the ethanol shipment volume on the rail system increased 144% (AAR BOE Annual Report 65,372 loads in 2004, AAR BOE Annual Report 159,000 (est.) loads in 2007). Below is a review of the number of ethanol shipments by rail for comparative purposes as well as the indication of ranking of hazardous material volume hauled on the rail system:

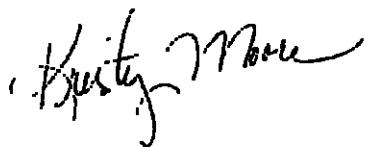
2004: Rank – 5	65,372 Loads
2005: Rank – 5	72,677 Loads
2006: Rank – 2	116,224 Loads
2007: Rank – 2	159,000 Loads

Even with the exponential growth of hazardous material fuel ethanol shipments on the rail system, there was a decline in the number of "non accidental releases" for ethanol shipments. Ethanol shipments had a NAR rate of 0.04% for 2007; that is 68 incidents in 159,000 shipments. A non-accident-caused release, or NAR, is the unintentional release of a hazardous material while in transportation that is not the result of a train accident. NARs consist of leaks, splashes, and other releases of product from improperly secured or defective valves, fittings, and tank shells, and also include venting of atmospheric gases from pressure relief devices. The tracking of NAR is a matrix used by both industry and government as an indication of compliance with regulatory requirements as well as indication of the safety practices of the industry. The decline in NARs for ethanol rail transport in 2007 is the direct result of the focus on safety by both the ethanol and rail transport industries. This cooperative effort, together with the Federal Railway Administration, continues to result in greatly improved information and procedures for the ethanol industry.

Another safety related initiative is the Ethanol Emergency Response Coalition, EERC. The RFA is a founding member of this Coalition which has the primary goal of developing the emergency response information available for ethanol. The EERC's first project produced a video entitled "Responding to Ethanol Incidents." This video provides essential information on proper foam selection when responding to fire incidents involving ethanol. The Ethanol Emergency Response Coalition's new website, www.ethanolresponse.com, will be a library of emergency and preparedness information for the first response community. Currently under development is a new video and training package geared for the fire response community.

If you should have any questions regarding these comments or would like to discuss this issue further, please do not hesitate to contact me at (309) 830- 6154.

Respectfully,



Kristy Moore
Director Technical Services